



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 29, 2016

BY ECF AND HAND DELIVERY

The Honorable Paul A. Engelmayer
United States District Court
40 Foley Square
New York, NY 10007

Re: *United States v. Jonathan Rodriguez et al.*, S2 15 Cr. 445 (PAE)

Dear Judge Engelmayer:

The Government writes in response to the Court's Order of February 25, 2016, and in advance of the status conference scheduled for March 2, 2016. As requested in Your Honor's February 25 Order, this letter provides a summary of the Government's provision of Rule 16 discovery to date and a proposed timetable for the case going forward, including a timetable on which the Government proposes to seek any superseding indictment. In preparing this letter, the Government has conferred with the Discovery Coordinator appointed by this Court, Adam Johnson, Esq., legal counsel for the Metropolitan Correctional Center ("MCC"), and with Jesse Siegel, Esq., who represents defendant WILFREDO RIVERA, a/k/a "Cito," in this case and who has in turn conferred with the other defense counsel of record. In addition, the Government has had numerous communications with individual defense counsel regarding, among other things, the production of Rule 16 discovery, and in particular to highlight for defense counsel the portions of the discovery most pertinent to each defendant.

By way of background, twenty-five of the twenty-six defendants charged in Indictment S2 15 Cr. 445 (PAE) (the "Second Superseding Indictment") have been arrested. One defendant (RYAN VALENTIN) remains a fugitive. Twenty-four of the defendants have been presented and arraigned in this District, and have had counsel appointed. Of those twenty four, only one—COREY HEYWARD—has not yet appeared before Your Honor; HEYWARD was arrested on February 25, 2016, and was presented, arraigned, and had counsel appointed (Ezra Spilke, Esq.), in Magistrates Court that same day. In addition, JONATHAN RODRIGUEZ, a/k/a "Bebo," has been arrested and arraigned on charges filed in the United States District Court for the Northern District of New York, and is expected to arrive in this District on March 1, 2016 for presentment, arraignment, and appointment of counsel in this case. The Government expects HEYWARD, RODRIGUEZ, and their respective counsels to appear at the March 2, 2016 status conference before Your Honor.

I. Rule 16 Discovery

Pursuant to the proposed discovery plan offered by the Government during the initial status conference held before Your Honor on December 11, 2015, the Government has produced its first two phases of Rule 16 discovery common to all defendants.¹ A summary of those discovery productions is below.

A. First Phase of Common Rule 16 Discovery

On January 11, 2016, the Government made the first phase of rolling discovery available to all defense counsel of record for inspection at the Office of the United States Attorney for the Southern District of New York. The Government also offered (by email dated January 11, 2016 and letter dated January 12, 2016) to produce the first phase of discovery materials common to all defendants to the Discovery Coordinator appointed by this Court, so that the Discovery Coordinator could provide the discovery to the defense counsel and defendants who agreed to be bound by the terms set forth in a proposed protective order.²

On January 13, 2016, the Court issued an order appointing the Discovery Coordinator in this case. After the Discovery Coordinator provided a 500 gigabyte hard drive to the Government for purposes of receiving the first phase of common discovery materials, the Government loaded those materials onto the drive and made it available to the Discovery Coordinator on January 27, 2016. From conferring with the Discovery Coordinator and Mr. Siegel, the Government understands that the Discovery Coordinator has provided this first phase of common discovery to each defense counsel of record, with the exception of Mr. Spilke, who only recently entered the case, on February 25, 2016.

In addition, after the Discovery Coordinator provided two additional 500 gigabyte hard drives to the Government, on January 29, 2016, the Government provided two hard drives containing identical sets of the first phase of common discovery materials to Mr. Johnson at the MCC, so that the defendants could have direct access to the discovery in the MCC library. The Government also relayed to defense counsel the Discovery Coordinator's offer, upon request from defense counsel, to provide each defendant with his own copy of the common discovery, so that that defendant may view the discovery on computers in his own unit within the MCC, rather than exclusively in the MCC library. From conferring with the Discovery Coordinator, Mr. Siegel, and Mr. Johnson, the Government understands that the defendants have been able to access this discovery at the MCC library. The Government further understands from these discussions that, for those defendants whose counsel so requested, the Discovery Coordinator has provided them individual copies of the phase one discovery, which these defendants have been able to review on computers in their respective units within the MCC.

¹ The Government also has provided individual discovery, including the defendant's criminal history, arrest reports, and any post-arrest statements. The Government has provided this individual discovery by email directly to the counsel of record for each defendant.

² The Government has reached an agreement with all defense counsel regarding the proposed protective order.

As set forth in the Government's discovery letter to all counsel of record of January 12, 2016, the discovery contained in the Government's first phase of rolling production is as follows:

1. The Indictment in this case. (Bates Numbers **1 – 25**.)
2. Warrants, applications, affidavits, orders, and audio recordings of judicially authorized interceptions of telephone calls from approximately August 20, 2015 through December 4, 2015, over the various and changing cellular telephones utilized by MARQUIS WRIGHT, a/k/a "Mark." (Bates Numbers **26 – 616**; audio recordings are provided in electronic format and not separately Bates numbered.) For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by date and type of information contained therein.
3. Footage from a pole camera located in the vicinity of 1114 White Plains Road, Bronx, New York. (Provided in electronic format and not separately Bates numbered.)
4. Social media search warrant, application, affidavit, and return. (Warrant, application, and affidavit: Bates Numbers **617 – 668**; returns: Bates Numbers **669 – 143,279**.) For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by the defendant whose social media account is at issue.
5. Cellular telephone search warrants, application, affidavit, and returns for phones used by WALI BURGOS, a/k/a "Guy Fisher," JORDAN RIVERA, and JASON BENJAMIN, a/k/a "JC." (Bates Numbers **143,280 – 143,315**; the returns are provided in electronic format not separately Bates numbered.) For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by cellphone, defendant, and type of material contained in each subfolder.

B. Second Phase of Common Rule 16 Discovery

On February 10, 2016, the Government made the second phase of rolling discovery available to all defense counsel of record for inspection at the Office of the United States Attorney for the Southern District of New York. The Government also offered (by email and letter dated February 10, 2016) to produce the second phase of discovery materials common to all defendants to the Discovery Coordinator appointed by this Court for provision to defense counsel and defendants who agreed to be bound by a proposed draft transcript stipulation.³

After the Discovery Coordinator provided three 500 gigabyte hard drives to the Government for purposes of receiving the second phase of common discovery materials, the Government loaded those materials onto the drives and made available one drive to the Discovery Coordinator on February 16, 2016. From conferring with the Discovery Coordinator and Mr. Siegel, the Government understands that the Discovery Coordinator has provided this

³ To date, all but four defense counsel have agreed to a draft transcript stipulation.

second phase of common discovery to each defense counsel of record who has agreed to be bound by the proposed draft transcript stipulation, with the exception of Mr. Spilke, as to whom the Discovery Coordinator is working to produce discovery.

In addition, on February 23, 2016, the Government provided two hard drives containing identical sets of the second phase of common discovery materials to Mr. Johnson at the MCC, so that the defendants could have direct access to that discovery in the MCC library. The Government also again relayed to defense counsel the Discovery Coordinator's offer that, upon request from defense counsel, she would provide each defendant with his own copy of the common discovery, so that that defendant may view the discovery on computers in his own unit within the MCC. From conferring with the Discovery Coordinator, Mr. Siegel, and Mr. Johnson, the Government understands that the defendants have been able to access this discovery at the MCC library, and that the Discovery Coordinator is working to provide individual sets of the second phase of common discovery materials to those defendants whose counsel has so requested.⁴

As set forth in the Government's discovery letter to all counsel of record of February 10, 2016, the discovery contained in the Government's second phase of rolling production is as follows:

6. Additional social media search warrant, application, affidavit, and return for second social media account of WALI BURGOS, a/k/a "Guy Fisher." (Bates Numbers **143, 318 – 144,768**.)
7. Draft transcriptions of calls and text communications intercepted pursuant to judicial orders of interception from approximately August 20, 2015 through December 4, 2015, issued by the United States District Court for the Southern District of New York, over the various and changing cellular telephones utilized by MARQUIS WRIGHT, a/k/a "Mark," as well as related surveillance. (Bates Numbers **146,287 – 153,518**.) For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by date and type of information contained therein.

⁴ One issue Mr. Siegel raised with the Government involved the limited times during which the defendants were permitted access to the MCC library to view the discovery. In the Government's experience in past cases, this concern has been resolved by providing each defendant with his own copy of the discovery which he can view in his MCC unit (rather than the MCC library), which the Discovery Coordinator has done with respect to the first phase of common discovery, and is endeavoring to do with respect to the second. To the extent that does not resolve the concerns of Mr. Siegel and other defense counsel in this case, the Government will work with defense counsel, Mr. Johnson, other members of the MCC staff—and, if necessary, the Court—to ensure the defendants have adequate access to the discovery. In addition, Mr. Siegel has raised the issue that the defendants are having difficulty viewing some of the videos that have been produced on MCC computers. The Government is currently working with Mr. Siegel and other defense counsel, and Mr. Johnson, to identify the problematic videos and to ensure the defendants have access to those videos in a format compatible with the MCC computers.

8. Warrants, applications, affidavits, orders, audio recordings and draft transcriptions of judicially authorized interceptions of telephone calls from approximately April 1, 2015 to June 20, 2015, issued by the United States District Court for the Northern District of New York, on cellular telephones used by JONATHAN RODRIGUEZ, a/k/a “Bebo,” and Tina Fumano. (Bates Numbers **144,769 – 146,286**.) For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by date and type of information contained therein.
9. Warrants, applications, affidavits, orders and returns in connection with premises search warrants executed on or about December 9, 2015. (Bates Numbers **153,890 – 154,089**.)
10. Paperwork relating to controlled purchases of narcotics by undercover officers and (where available) audio and/or video recordings. (Bates Numbers **153,519 – 153,889**.) Audio and/or video recordings are not separately Bates numbered. For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by date and type of information contained therein.⁵
11. Paperwork and other relevant material pertaining to criminal incidents relevant to this case. (Bates Numbers **154,090 – 156,079**.) Videos are not separately Bates numbered. For ease of reference, on the hard drives loaded by the Government, the Government has separated these materials into separate subfolders labeled by date and type of information contained therein.

In addition, in the Government’s discovery letter of February 10, 2016, the Government provided defense counsel with the following charts, summarizing the undercover narcotics purchases and criminal incidents in this case.

⁵ By email dated February 28, 2016, the Government provided defense counsel with forty-one pages of additional laboratory reports (Bates Numbers **156,080 – 156,120**) in connection with the controlled purchases of narcotics identified in this letter. Those additional laboratory reports are included in the chart of undercover buys included herein.

Charts of Controlled Buys and Criminal Incidents*Chart of Controlled Buys*

#	Individuals Involved	JD Name	Date	Location	Complaint/ Buy Report	Property Voucher	Lab Report	Drug	Bates Nos.	Voucher #	Recording
1	Marquis Wright	Mark	10/8/14	331 E 146th Street	Y	Y	Y	crack	153,519 – 153,526	2000367486	N
2	Marquis Wright	Mark	10/13/14	308 E. 145th Street	Y	Y	Y	crack	153,527 – 153,530	2000369216	N
3	Marquis Wright	Mark	10/21/14	331 E 146th Street	Y	Y	N	crack	153,531 – 153,535	2000372145	N
4	Marquis Wright	Mark	10/29/14	337 E. 146th Street	Y	Y	N	crack	153,536 – 153,540	2000374651	N
5	Jordan Rivera	Jordan	12/18/14	011 E. 146th Street	Y	Y	Y	crack	153,541 – 153,545	2000388542	Y
6	Tjon Macoll	TJ	12/18/14	331 E. 146th Street	Y	Y	Y	weed	153,546 – 153,552	2000388551	N
6	Jordan Rivera	Jordan	12/18/14	331 E. 146th Street	Y	Y	N	weed	153,546 – 153,552	2000388551	N
7	Jordan Rivera	Jordan	1/5/15	342 E. 146th Street	Y	Y	Y	crack	153,553 – 153,557	2000391231	Y
8	Jordan Rivera	Jordan	1/13/15	337 E.146th Street	Y	Y	Y	crack	153,558 – 153,563	2000393399	Y
8	Wilfredo Rivera	Ponytail	1/13/15	337 E.146th Street	Y	Y	Y	crack	153,558 – 153,563	2000393399	Y
9	Unidentified	Tan	1/13/15	308 E. 145th Street	Y	Y	Y	weed	153,564 – 153,570	2000393411	Y
9	Les Vargas	Boogie	1/13/15	308 E. 145th Street	Y	Y	Y	weed	153,564 – 153,570	2000393411	Y
10	Jonathan Harris	Paulie	1/19/15	331 E. 146th Street	Y	Y	N	weed	153,571 – 153,577	2000395268	N
10	Tjon Macoll	TJ	1/19/15	331 E. 146th Street	Y	Y	N	weed	153,571 – 153,577	2000395268	N
11	Jason Benjamin	JC	1/20/15	308 E. 145th Street	Y	Y	Y	crack	153,591 – 153,593	2000395613	Y
11	Jordan Rivera	Jordan	1/20/15	308 E. 145th Street	Y	Y	Y	crack	153,591 – 153,593	2000395613	Y
11	Unidentified	Braids	1/20/15	308 E. 145th Street	Y	Y	Y	crack	153,591 – 153,593	2000395613	Y
12	Les Vargas	Boogie	1/20/15	308 E. 145th Street	Y	Y	N	weed	153,578 – 153,590	2000395620	Y
13	Les Vargas	Boogie	1/23/15	308 E. 145th Street	Y	Y	Y	weed	153,594 – 153,607	2000396705	Y
14	Jason Benjamin	JC	2/3/15	328 E. 145th Street	Y	Y	Y	crack	153,608 – 153,629	2000399337	N
15	Vincent Fielder	DJ	2/5/15	328 E. 145th Street	Y	Y	Y	crack	153,630 – 153,647	2000400044	Y
16	Jonathan Harris	Paulie	2/10/2015	331 E. 146th Street	Y	Y	N	weed	153,648 – 153,665	2000401383	Y
17	Vincent Fielder	DJ	2/17/2015	301 E. 143rd Street	Y	Y	Y	crack	153,666 – 153,676	2000403305	Y
18	Jonathan Harris	Paulie	2/17/2015	331 E. 146th Street	Y	Y	Y	weed	153,677 – 153,686	2000403315	Y
18	James House	Gap	2/17/2015	331 E. 146th Street	Y	Y	Y	weed	153,677 – 153,686	2000403315	Y
19	Jonathan Harris	Paulie	2/19/2015	331 E. 146th Street	Y	Y	Y	weed	153,687 – 153,703	2000404012	Y
20	Jordan Rivera	Jordan	3/9/2015	328 E. 145th Street	Y	Y	Y	crack	153,704 – 153,707	2000409324	Y
21	Jordan Rivera	Jordan	3/10/2015	328 E. 145th Street	Y	Y	N	crack	153,713 – 153, 716	2000409595	Y
22	Unidentified	Girl	3/10/2015	308 E. 145th Street	Y	Y	Y	crack	153,708 – 153,713	2000409610	Y

23	Unidentified	Ike	3/11/2015	E. 149th St & 3rd Ave	Y	Y	N	heroin	153,717 – 153,726	2000409980	Y
24	Pamela Brown	Wrap	3/11/2015	308 E. 145th Street	Y	Y	Y	crack	153,727 – 153,732	2000409993	Y
25	Jordan Rivera	Jordan	3/18/2015	328 E. 145th Street	Y	Y	Y	crack	153,746 – 153,749	2000412152	Y
26	Unidentified	Braids	3/18/2015	E.148th St & College Ave	Y	Y	Y	weed	153,733 – 153,745	2000412160	N
26	Unidentified	Grey	3/18/2015	E.148th St & College Ave	Y	Y	Y	weed	153,733 – 153,745	2000412160	N
27	Jordan Rivera	Jordan	3/24/2015	328 E. 145th Street	Y	Y	Y	crack	153,750 – 153,755	2000413952	Y
28	Jordan Rivera	Jordan	4/1/2015	328 E. 145th Street	Y	Y	Y	crack	153,761 – 153,766	2000416306	Y
29	Vincent Fielder	DJ	4/1/2015	2706 3rd Avenue	Y	Y	Y	crack	153,756 – 153,760	2000416299	Y
30	William Amarizan	Gray	4/1/2015	331 E. 146th Street	Y	Y	Y	weed	153,767 – 153,771	2000416311	Y
30	Jonathan Harris	Paulie	4/1/2015	331 E. 146th Street	Y	Y	Y	weed	153,767 – 153,771	2000416311	Y
31	Vincent Fielder	DJ	4/2/2015	370 Morris Avenue	Y	Y	Y	crack	153,772 – 153,782	2000416641	Y
31	Jonathan Harris	Paulie	4/2/2015	370 Morris Avenue	Y	Y	Y	crack	153,772 – 153,782	2000416641	Y
32	Jonathan Harris	Paulie	4/7/2015	331 E. 146th Street	Y	Y	Y	weed	153,783 – 153,786	2000417883	Y
33	Jordan Rivera	Jordan	4/8/2015	328 E. 145th Street	Y	Y	Y	crack	153,787 – 153,790	2000418273	Y
34	Jonathan Harris	Paulie	4/8/2015	331 E. 146th Street	Y	Y	Y	weed	153,791 – 153,796	2000418271	Y
35	Unidentified	Mel	4/8/2015	337 E. 146th Street	Y	Y	N	weed	153,797 – 153,801	2000418267	Y
36	Jordan Rivera	Jordan	4/9/2015	328 E. 145th Street	Y	Y	Y	crack	153,802 – 153,806	2000418607	Y
37	Unidentified	Mel	4/9/2015	337 E. 146th Street	Y	Y	N	weed	153,807 – 153,809	2000418608	Y
38	Jonathan Harris	Paulie	4/13/2015	331 E. 146th Street	Y	Y	Y	weed	153,810 – 153,812	2000419697	Y
38	Corey Cooks	Scar	4/13/2015	331 E. 146th Street	Y	Y	Y	weed	153,810 – 153,812	2000419697	Y
39	Corey Cooks	Scar	4/15/2015	331 E. 146th Street	Y	Y	Y	weed	153,813 – 153,816	2000420273	Y
40	Jonathan Harris	Paulie	4/21/2015	331 E. 146th Street	Y	Y	Y	weed	153,817 – 153,821	2000421988	N
40	William Amarizan	Gray	4/21/2015	331 E. 146th Street	Y	Y	Y	weed	153,817 – 153,821	2000421988	N
41	Jonathan Harris	Paulie	4/23/2015	331 E. 146th Street	Y	Y	Y	weed	153,827 – 153,834	2000422753	Y
41	Corey Cooks	Scar	4/23/2015	331 E. 146th Street	Y	Y	Y	weed	153,827 – 153,834	2000422753	Y
42	Unidentified	Mel	4/23/2015	337 E. 146th Street	Y	Y	N	weed	153,822 – 153,826	2000422754	N
43	Unidentified	Mel	4/28/2015	337 E. 146th Street	Y	Y	N	weed	153,841 – 153,850	2000424214	N
44	Unidentified	M Dot	4/28/2015	E. 141 Street & 3 Ave	Y	Y	Y	crack	153,835 – 153,840	2000424215	N
45	Jordan Rivera	Jordan	5/4/2015	328 E. 145th Street	Y	Y	Y	crack	153,851 – 153,854	2000425876	Y
45	Christian Figueroa	Wavy	5/4/2015	328 E. 145th Street	Y	Y	Y	crack	153,851 – 153,854	2000425876	Y
46	Jordan Rivera	Jordan	5/12/2015	328 E. 145th Street	Y	Y	Y	crack	153,855 – 153,859	2000428107	Y
46	Daquan McBeth	Daquan	5/12/2015	328 E. 145th Street	Y	Y	Y	crack	153,855 – 153,859	2000428107	Y
46	Raheem Amarizan	Raheem	5/12/2015	328 E. 145th Street	Y	Y	Y	crack	153,855 – 153,859	2000428107	Y

47	Jordan Rivera	Jordan	5/21/2015	331 E. 146th Street	Y	Y	Y	crack	153,860 – 153,863	2000430945	N
47	Tjon Macoll	TJ	5/21/2015	331 E. 146th Street	Y	Y	Y	crack	153,860 – 153,863	2000430945	N
48	Jonathan Harris	Paulie	5/28/2015	337 E. 146th Street	Y	Y	Y	weed	153,864 – 153,865	2000432989	Y
48	Tjon Macoll	TJ	5/28/2015	337 E. 146th Street	Y	Y	Y	weed	153,864 – 153,865	2000432989	Y
49	Tjon Macoll	TJ	6/4/2015	331 E. 146th Street	Y	Y	N	weed	153,866 – 153,869	2000435189	Y
49	Raheem Amarizan	Raheem	6/4/2015	331 E. 146th Street	Y	Y	N	weed	153,866 – 153,869	2000435189	Y
49	Jordan Rivera	Jordan	6/4/2015	331 E. 146th Street	Y	Y	N	weed	153,866 – 153,869	2000435189	Y
49	James House	Gap	6/4/2015	331 E. 146th Street	Y	Y	N	weed	153,866 – 153,869	2000435189	Y
50	Tjon Macoll	TJ	6/9/2015	331 E. 146th Street	Y	Y	N	weed	153,870 – 153,873	2000436782	Y
51	Tjon Macoll	TJ	6/16/2015	331 E. 146th Street	Y	Y	N	weed	153,874 – 153,878	2000439080	Y
52	Jordan Rivera	Jordan	7/7/2015	328 E. 146th Street	Y	Y	N	crack	153,879 – 153,883	2000445579	Y
53	Jordan Rivera	Jordan	7/13/2015	342 E. 145th Street	Y	Y	N	weed	153,884 – 153,889	2000447675	Y
53	Christian Figueroa	Wavy	7/13/2015	342 E. 145th Street	Y	Y	N	weed	153,884 – 153,889	2000447675	Y
53	Unidentified	Tan	7/13/2015	342 E. 145th Street	Y	Y	N	weed	153,884 – 153,889	2000447675	Y
53	Unidentified	Mel	7/13/2015	342 E. 145th Street	Y	Y	N	weed	153,884 – 153,889	2000447675	Y

Chart of Criminal Incidents

Date	Complaint #	Defendants Involved	Type of Incident	Location	Bates Number
3/5/2006	2006-040-02839	Daquan McBeth	Shooting	Third Ave. & East 139 th St.	154,090 – 154,093
9/26/2009	2009-040-11073	Jason Benjamin	Shooting	College Ave. & East 146 th St.	154,094 – 154,164
8/31/2010	2010-040-09765	Raheem Amarizan	Shooting	301 East 143 rd St.	154,165 – 154,170
5/29/2011	2011-040-05316	Keith Ruiz	Murder	2625 Third Ave.	154,171 – 155,500
5/30/2011	2011-040-05326	Daquan McBeth (victim)	Shooting	308 East 145th St.	155,501 – 155,505
7/8/2011	2011-040-06906	Raheem Amarizan (victim)	Shooting	308 East 145th St.	155,506 – 155,513
9/16/2011	2011-040-09416	William Knox	Shooting	448 College Ave.	155,514 – 155,517
12/5/2011	2011-040-12704	William Amarizan Tjon Macoll	Shooting	315 East 145 th Street	155,518 – 155,531
12/28/2011	2011-040-13529	William Amarizan (victim)	Shooting	308 East 145 th St.	155,532 – 155,537
3/30/2012	2012-040-03655	Wilfredo Rivera (victim)	Shooting	338 East 145 th St.	155,538 – 155,542
7/20/2012	2012-040-08252	Unnamed co-conspirator (victim)	Stabbing	2774 Third Ave.	155,543 – 155,546
8/28/2012	2012-040-09865	William Knox	Shooting	424 Morris Ave.	155,547 – 155,550
9/15/2012	2012-040-10565	Corey Heyward	Shooting	308 East 145 th St.	155,551 – 155,563
3/30/2013	2013-040-03374	Miguel Romero	Shooting	281 East 143 rd St.	155,564 – 155,597
7/27/2013	2013-040-08080	Kaye Rosado (victim)	Shooting	338 East 145 th St.	155,598 – 155,600
9/24/2013	2013-040-10432	Tjon Macoll	Shooting	208 East 145 th St.	155,601 – 155,619
12/11/2013	2013-040-13505	Diquinn Lacend	Gun Possession	281 East. 143 rd St.	155,620 – 155,625
12/12/2013	2013-040-13536	Jonathan Rodriguez Marquis Wright Jason Benjamin William Amarizan Raheem Amarizan Cory Heyward Daquan McBeth Andrew Echevarria Kaye Rosado Kenneth Jenkins Mia Dentico	Search Warrant	485 Courtlandt Ave.	155,626 – 155,695
5/7/2014	2014-040-4698	William Knox	Gun Possession	308 East 145 th St.	155,696 – 155,873
7/19/2014	2014-040-07672	Jordan Rivera	Gun Possession	428 East 146 th St.	155,874 – 155,884
8/21/2014	2014-040-09105	Ryan Valentin Jordan Rivera	Shooting	300 East 143 rd St.	155,885 – 155,900
10/2/2014	2014-040-10875	Wali Burgos Corey Cooks Jordan Rivera	Shooting	328 East 145th St.	155,901 – 155,914
3/12/2015	2015-040-02503	Marquis Wright	Drug Distribution	College Ave. & East 146 th St.	155,915 – 155,923
4/15/2015	2015-040-03786	Wilfredo Rivera	Stabbing	2690 Third Avenue	155,924 – 155,927
5/18/2015	2015SZ0073124 01	Pamela Brown	Drug Distribution	State Route 56 Norfolk, NY	155,928 – 155,933
6/4/2015	2015-040-05893	Kaye Rosado	Drug Distribution	2615 Third Ave.	155,934 – 155,987

6/11/2015	2015-040-06177	Andrew Echevarria	Gun & Drug Arrest	360 East 137th Street	155,988 – 156,028
7/18/2015	2015-048-5266	Wilfredo Rivera	Gun Possession	Bathgate Ave. & East 180 th St.	156,029 – 156,031
7/29/2015	2015-040-08334	Tjon Macoll	Shooting	College Ave. & East 148 th St.	156,032 – 156,042
10/22/2015	2015-048-08349	Wilfredo Rivera	Drug Distribution	Park Ave. & 180 th St.	156,043 – 156,054
10/27/2015	2016SZ0000709302	William Amarizan	Drug Distribution	Canton, NY	156,055 – 156,058
12/9/2015		Jonathan Rodriguez	Search Warrant	290 Regan Road Norwood, NY	156,059 – 156,079
12/9/2015		Unnamed co-conspirator	Search Warrant	331 East 146 th Street	153,926 – 153,928
12/9/2015		Marquis Wright	Search Warrant	1114 White Plains Rd.	153,931 – 153,931

C. Additional Rule 16 Discovery Productions

The Government recognizes that its discovery obligations are ongoing. The Government expects that, as it continues to investigate the incidents identified above, and the charged racketeering conspiracy more generally, it will obtain possession, custody, or control of other material that may be discoverable under rule 16. For example, in connection with the defendants' arrests, the Government seized numerous cellphones for which it later obtained search warrants. Many of these cellphones are password protected, and the Government has not yet been able to retrieve data from them and to process the data retrieved pursuant to the search warrants. The Government is continuing to work to obtain and/or process that data, and when it does, it will produce that material as soon thereafter as practicable. To the extent the Government comes into possession, custody, or control of other material that is discoverable under Rule 16, it will produce it as soon as practicable as well.

II. The Government's Proposed Schedule for the Case

In the Court's February 25 Order, the Court also requested that the Government provide its view regarding (1) the timetable on which the Government intends to seek any superseding indictment in this case, and (2) the schedule in this case going forward.

The Government does expect to seek a superseding indictment in this case. In particular, the Government expects to seek a superseding indictment, among other things, (a) to add charges against one or more named defendants arising out of a murder that is not charged in the Second Superseding Indictment; (b) to add one or more named defendants to charges already contained in the Second Superseding Indictment; and (c) to add charges pertaining to incidents that are identified in the Second Superseding Indictment as "overt acts" in furtherance of the racketeering conspiracy charged in Count One of that indictment. The Government expects to seek the superseding indictment in the coming months.

As for the schedule of this case going forward, the Government is prepared to proceed on any schedule set by the Court. After conferring with Mr. Siegel, the Government understands that, at the March 2 status conference, defense counsel expect to request a period of time to

CC: All defense counsel of record (by e-mail and ECF)